

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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In re Entresto (Sacubitril/Valsartan) Patent  
Litigation

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C.A. No. 20-2930-RGA

NOVARTIS PHARMACEUTICALS  
CORPORATION,

Plaintiff,

v.

C.A. No. 22-1395-RGA

MSN PHARMACEUTICALS INC.,  
MSN LABORATORIES PRIVATE  
LIMITED, MSN LIFE SCIENCES  
PRIVATE LIMITED, GERBERA  
THERAPEUTICS, INC., NANJING  
NORATECH PHARMACEUTICAL CO.,  
LIMITED,

Defendants.

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NOVARTIS PHARMACEUTICALS  
CORPORATION,

Plaintiff,

v.

C.A. No. 19-2053-RGA

HETERO USA INC., HETERO LABS  
LIMITED, HETERO LABS LIMITED  
UNIT III, MSN PHARMACEUTICALS  
INC., MSN LABORATORIES PRIVATE  
LIMITED, MSN LIFE SCIENCES  
PRIVATE LIMITED,

Defendants.

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**JOINT MOTION FOR EXEMPTION OF PERSONS FROM THE DISTRICT OF  
DELAWARE'S MAY 17, 2024 STANDING ORDER ON PERSONAL DEVICES**

The parties, Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) and Defendants MSN Pharmaceuticals Inc., MSN Laboratories Private Limited, and MSN Life Sciences Private Limited (collectively, “MSN”), jointly move for an order to exempt certain persons from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of this Motion, the parties state as follows:

1. The District of Delaware’s May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require *inter alia*, for visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.

2. A hearing on (1) Novartis’s Motion for Preliminary Injunction Against MSN (D.I. 1423 in 20-md-2930-RGA); and (2) Motion for a Rule 62(d) Injunction Pending Appeal and Temporary Restraining Order Pending Resolution of this Motion (D.I. 1432 in 20-md-2930-RGA) in these matters is currently scheduled for August 9, 2024 in Courtroom 6A before Judge Andrews.

3. Nicholas Kallas, Christina Schwarz, Christopher Loh, Jared Stringham, and Gregory Manas of VENABLE LLP are counsel of record for Novartis who have been admitted *pro hac vice* in these matters. They will be attending the hearing, will be arguing or assisting with Novartis’s argument presentation at the hearing, and they request access to their electronic devices in connection with the hearing. However, these individuals do not otherwise meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order.

4. Brian Robinson, Robert Stanley, and Jean Silveri are client representatives from Novartis, will be attending the hearing, and request access to their electronic devices for purposes of consulting with counsel and performing their job duties in connection with the hearing. However, these individuals do not otherwise meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order.

5. Richard Juang and Ronald M. Daignault of Daignault Iyer LLP are counsel of record for MSN who have been admitted *pro hac vice* in these matters. They will be attending the hearing, will be arguing or assisting with MSN's argument presentation at the hearing, and they request access to their electronic devices in connection with the hearing. However, these individuals do not otherwise meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order.

6. Kondal Reddy Bairy and Rakesh Sappa Sri Siva are client representatives from MSN, will be attending the hearing, and request access to their electronic devices for purposes of consulting with counsel and performing their job duties in connection with the hearing. However, these individuals do not otherwise meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order.

7. Scott Aaron of BlueBear Solutions, Inc. has been hired by MSN as its hot-seat operator, will provide MSN with technology-related support, and will assist MSN with its presentation at the August 9 hearing. Mr. Aaron requests access to his electronic devices and equipment for these purposes.

The parties jointly respectfully request that the Court issue an order granting this motion to exempt these individuals from the May 17, 2024 Standing Order for the August 9 Hearing.

Dated: August 6, 2024

McCARTER & ENGLISH, LLP

/s/ Alexandra M. Joyce

Daniel M. Silver (#4758)  
Alexandra M. Joyce (#6423)  
Renaissance Centre  
405 N. King Street, 8th Floor  
Wilmington, Delaware 19801  
(302) 984-6300  
dsilver@mccarter.com  
ajoyce@mccarter.com

OF COUNSEL:

Nicholas N. Kallas  
Christina Schwarz  
Christopher E. Loh  
Jared L. Stringham  
Gregory J. Manas  
VENABLE LLP  
151 West 42<sup>nd</sup> Street  
New York, New York 10036  
(212) 307-5500  
nkallas@venable.com  
cschwarz@venable.com  
cloh@venable.com  
jlstringham@venable.com  
gjmanas@venable.com

*Attorneys for Plaintiff Novartis  
Pharmaceuticals Corporation*

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

Stamatios Stamoulis (#4606)  
Richard C. Weinblatt (#5080)  
800 N. West Street, Third Floor  
Wilmington, DE 19801  
(302) 999-1540  
stamoulis@swdelaw.com  
weinblatt@swdelaw.com

Ronald M. Daignault\*  
Richard Juang\*  
DAIGNAULT IYER LLP  
8618 Westwood Center Drive, Suite 150  
Vienna, VA 22182  
rdaignault@daignaultiyer.com  
rjuang@daignaultiyer.com  
*\*Not admitted in Virginia*

*Attorneys for Defendants MSN  
Pharmaceuticals Inc., MSN Laboratories  
Private Limited, and MSN Life Sciences  
Private Limited*